

*Jennifer Louise Jenkins, Administrator ad Litem of the Estate of Sterling L. Higgins  
v. Obion County, Tennessee, et al.*

No. 20-cv-01056 STA-atc

Declaration of Edwin S. Budge

Exhibit F

**RE: Estate of Higgins v. Obion County, et al.**

Edwin Budge <ed@budgeandheipt.com>

Mon 2/15/2021 2:01 PM

**To:** 'William Mauldin' <wmauldin@pgmfirm.com>; 'Nathan Tilly' <ntilly@pgmfirm.com>; 'John Burleson' <jburleson@raineykizer.com>; 'Dale Thomas (dthomas@raineykizer.com)' <dthomas@raineykizer.com>; 'Dale Conder' <dconder@raineykizer.com>; 'Matthew Courtner' <mcourtner@raineykizer.com>; 'Michael R. Hill' <mh\_fch@bellsouth.net>; 'Laura (len\_fch@bellsouth.net)' <len\_fch@bellsouth.net>; 'Melissa Tart' <MTart@pgmfirm.com>  
**Cc:** Sally Hartmann <sally@budgeandheipt.com>; 'David Cooper' <dcooper@cooperlawfirm.com>

Counsel,

I realize you may not be in the office today, but if you are I'm writing to remind you of this request. I did not cc your paralegals, assuming you'll do that if necessary.

Please provide this information as soon as possible. I'm sure they can be easily accessed and sent to us.

Thank you.

Edwin S. Budge  
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808 E. Roy St.  
Seattle, WA 98102  
206.624.3060  
www.budgeandheipt.com

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**From:** Edwin Budge

**Sent:** Friday, February 12, 2021 8:32 AM

**To:** William Mauldin <wmauldin@pgmfirm.com>; Nathan Tilly <ntilly@pgmfirm.com>; 'John Burleson' <jburleson@raineykizer.com>; 'Dale Thomas (dthomas@raineykizer.com)' <dthomas@raineykizer.com>; Dale Conder <dconder@raineykizer.com>; Matthew Courtner <mcourtner@raineykizer.com>; Michael R. Hill <mh\_fch@bellsouth.net>; Laura (len\_fch@bellsouth.net) <len\_fch@bellsouth.net>; Melissa Tart <MTart@pgmfirm.com>

**Cc:** Sally Hartmann <sally@budgeandheipt.com>; David Cooper <dcooper@cooperlawfirm.com>

**Subject:** Estate of Higgins v. Obion County, et al.

Dear Counsel:

I'd like to be sure we have a complete copy of the records requests (i.e. the letters that you've sent to various entities) using our client's executed authorizations for releases of information that we provided to you. This includes employers, medical providers, the SSA, public agencies and others. Please have your staff provide us with copies of those at your soonest opportunity along with the releases you attached to your letters.

You can provide them in response to this email and please be sure to cc my legal assistant and David Cooper.

Thanks for your cooperation.

Edwin S. Budge  
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